

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

**FILED**JUN 06 2018 *PK*THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS

_____	)	
Aleksandr Selyutin	)	
Plaintiff(s),	)	1:18-cv-03951
v.	)	Judge Charles P. Kocoras
Aon plc., Aon Service Corporation	)	Magistrate Judge Maria Valdez
Unknown Defendants	)	
Defendant(s).	)	

**COMPLAINT OF EMPLOYMENT DISCRIMINATION**

1. This is an action for employment discrimination.
2. The plaintiff is Aleksandr Selyutin of the  
county of Cook in the state of Illinois.
3. The defendant is Aon Service Corporation (See Attached Sheet List of All Defendants) whose  
street address is 200 E Randolph ave (Please see attached Sheet - List of All Defendants)  
(city) Chicago (county) Cook (state) Illinois (ZIP) 60601  
(Defendant's telephone number) (312) - 381-1000
4. The plaintiff sought employment or was employed by the defendant at (street address)  
200 E. Randolph (city) Chicago  
(county) Cook (state) Illinois (ZIP code) 60601

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5. The plaintiff [*check one box*]

- (a) ☐ was denied employment by the defendant.
- (b) ☐ was hired and is still employed by the defendant.
- (c) ☒ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) November, (day) 20, (year) 2011.

7.1 (*Choose paragraph 7.1 or 7.2, do not complete both.*)

- (a) The defendant is not a federal governmental agency, and the plaintiff [*check one box*] ☒ has ☐ has not filed a charge or charges against the defendant

asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☐ the United States Equal Employment Opportunity Commission, on or about (month) February (day) 8 (year) 2018.
- (ii) ☐ the Illinois Department of Human Rights, on or about (month) \_\_\_\_\_ (day) \_\_\_\_\_ (year) \_\_\_\_\_.

- (b) If charges *were* filed with an agency indicated above, a copy of the charge is attached. ☒ Yes, ☐ No, **but plaintiff will file a copy of the charge within 14 days.**

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

- (a) the plaintiff previously filed a Complaint of Employment Discrimination with the

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defendant asserting the acts of discrimination indicated in this court complaint.

☐ Yes (month)\_\_\_\_\_ (day)\_\_\_\_\_ (year) \_\_\_\_\_

☐ No, did not file Complaint of Employment Discrimination

(b) The plaintiff received a Final Agency Decision on (month)\_\_\_\_\_  
(day) \_\_\_\_\_ (year) \_\_\_\_\_.

(c) Attached is a copy of the

(i) Complaint of Employment Discrimination,

☐ Yes ☐ No, but a copy will be filed within 14 days.

(ii) Final Agency Decision

☐ Yes ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☐ the United States Equal Employment Opportunity Commission has not  
issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued  
a *Notice of Right to Sue*, which was received by the plaintiff on  
(month) March (day) 15 (year) 2018 a copy of which  
*Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's [***check only those that apply***]:

(a) ☐ Age (Age Discrimination Employment Act).

(b) ☐ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

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- (c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)
  - (d) ☐ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
  - (e) ☐ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).
  - (f) ☐ Religion (Title VII of the Civil Rights Act of 1964)
  - (g) ☐ Sex (Title VII of the Civil Rights Act of 1964)
10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).
11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the ADA by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791; and for the ADEA, 29 U.S.C. § 626(c).
12. The defendant [*check only those that apply*]
- (a) ☐ failed to hire the plaintiff.
  - (b) ☒ terminated the plaintiff's employment.
  - (c) ☐ failed to promote the plaintiff.
  - (d) ☐ failed to reasonably accommodate the plaintiff's religion.
  - (e) ☐ failed to reasonably accommodate the plaintiff's disabilities.
  - (f) ☒ failed to stop harassment;
  - (g) ☐ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
  - (h) ☒ other (specify): The Plaintiff was retaliated against due to his formal complaint to

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]



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Defendant's hiring practices in violation of EEOC rules & regulations

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13. The facts supporting the plaintiff's claim of discrimination are as follows:

Claims: Retaliation, Harassment, Public Humiliation, Discrimination, Wrongful

termination, Prohibited inquiries.

Please see attached Pages with Statement of Claims with all facts and details

in support the Plaintiff's claims of discrimination

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14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ Yes ☐ No

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff **[check only those that apply]**

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☐ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☐ Direct the defendant to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ Direct the defendant to (specify): Order the Defendants, the Defendants' officers, agents,  
servants, employees, and attorneys; and other persons who are  
in active concert or participation with it from Harasment, Retaliation,

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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Invasion of privacy, monitoring, following and other wrongful conduct and from  
financing of such activities or conduct against Aleksandr Selyutin, his parents and relatives

(Please see attached Pages with Statement of Claims under Prayer for Relief section).

- (g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.
- (h) ☒ Grant such other relief as the Court may find appropriate.

Aleksandr Selyutin  
(Plaintiff's signature)

Aleksandr Selyutin  
(Plaintiff's name)

8828 Niles Center Rd., apt 213  
(Plaintiff's street address)

(City) Skokie (State) Illinois (ZIP) 60077

(Plaintiff's telephone number) ( 847 ) – 679-4587

Date: 06-06-2018

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## ATTACHMENT STATEMENT OF CLAIMS

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ILLINOIS  
NORTHERN DIVISION

Aleksandr Selyutin

)

)

Plaintiff,

)

)

Civil Action No.

V.

)

)

Aon plc., Aon Service Corporation  
Unknown Defendants

)

Defendant.

)

## STATEMENT OF CLAIMS

Claims 1-7, Retaliation, Harassment, Public Humiliation, Violation of Privacy, Discrimination, Wrongful termination, and Prohibited inquiries:

1. More than thirty days prior to the institution of this lawsuit, Aleksandr Selyutin filed a charge of discrimination with the Commission alleging violations of Title I of the ADA by the Defendants. All conditions precedent to the institution of this lawsuit has been fulfilled.

2. At all relevant times, Aleksandr Selyutin was an individual with an actual disability as defined by the ADA;
3. Selyutin began working for Defendants in March 2001 as a staff accountant in the Glenview IL, office of Aon Risk Solutions/Aon Service Corporation.
4. Over the years while employed by the Defendant, Selyutin completed his MBA with Distinctions in October 2007, Received Professional Certification as Certified Treasury Professional (CTP) in June 2004, and completed all courses for the Certified Internal Auditor in 2014; and his last position with Defendants was Senior Finance Manager;
5. In November 2011, Selyutin filed with Defendant's Human Resources Department formal complaint alleging that the Defendants hiring practices were in violation of Equal Employment Opportunity Act. Multiple position in Aon Risk Services US Retail Finance Team headed by Renae Flanders, Chief Financial Officer, were not posted for general public to apply within formal interview process; individuals for un-posted positions were picked in violation of EEOC regulations and Defendant's hiring policies;
6. Defendants retaliated and beginning from November 2011 Selyutin was subjected to harassment, privacy violations, mental torture, sensory assaults and public humiliation from the Defendants that lead Selyutin to develop depression and paranoia. Selyutin reported the incidents of harassment, privacy violations and public humiliation to Defendant's Human Resources Department, and to his direct supervisor David Brown, Senior Finance Director, and documented the incidents in his annual review. The Defendants failed to stop harassment, privacy violations and public humiliation. Selyutin



also reported the separate incidents of disturbing messages, harassments calls, privacy violations, property damage, several break-ins to his residence to Village of Skokie Police Departments and City of Chicago Police Department;

7. Selyutin suffered from depression and paranoia; Defendants were aware of his depression and paranoia and provided him with accommodation of working remotely from home from 2012 until his wrongful discharge on May 10, 2017; Selyutin also suffered from Chronic obstructive pulmonary disease (COPD), Rheumatoid Arthritis and asthma, and later was diagnosed with post traumatic stress disorder (PTSD); Defendants were aware of his disabilities;

8. As a result of his disability, Selyutin was substantially limited in major life activities, including but not limited to eating, sleeping, thinking, concentrating, and interacting with others.

9. In November 2016, Selyutin was told by the Defendants that his position as Senior Finance Manager would be transformed and that he will have new supervisor and new responsibilities. This was confirmed by the Defendant's HR Director Frane in conference call with Selyutin in late November 2016;

10. On or around April 7, 2017 Selyutin received his approved annual goals for 2017 from his new supervisor Jeff Grace, Senior Manager Finance and Global Sarbanes Oxley Compliance Lead for Global Aon Risk Solution;

11. On April 10, 2017 Selyutin was evaluated by Licensed Clinical Psychologist Erick A. Neu, Psy.D., at Forensic Clinical Services at Chicago IL, per order of Hon. Michael J. Hood, Judge of the Second Municipal District Circuit Court of Cook County.

12. On or around April 24, 2017 the Defendants inquired about this evaluation and to the nature and severity of the disability, and medications, in violations of the American with Disabilities of 1990, Sec. 12112 (d) (4); Selyutin witnessed that his former attorney Joseph Kennelly, at Skokie Court Building, discussed on the phone Selyutin's evaluation with the Defendants; Also, Joseph Kennelly, Selyutin's former attorney, exhibited full knowledge about his evaluation, and asked Selyutin some questions related to the information that Selyutin provided only to Erick A. Neu, Psy.D., Licensed Clinical Psychologist at Forensic Clinical Services at Chicago IL, during his evaluation;

13. On April 26, 2017, Selyutin was informed by the Defendants that his position was eliminated and that his last day would be May 10, 2017 or two weeks from April 26, 2017;

14. Selyutin was given two weeks to find another position within Aon, while another employee, Selyutin's former supervisor Steven Crnokrak, who did not have any health related issues and disabilities, and whose position was eliminated back in September 2013, was given 30 days to look for another position; This is a violations of the American with Disabilities ACT of 1990, Sec. 12112 (a) (2).

15. No other positions were offered to Selyutin or available for him to apply;

16. On or around August 3, 2017, Selyutin was told by his former attorney Joseph Kennelly, that if he would plead guilty on one count, and take a court supervision in case that is still pending in Second Municipal District Circuit Court of Cook County, he would get his old job back (with the Defendants) and more.

17. On or around August 8, 2017, the Defendants posted the position with exact responsibilities as Selyutin had back in November 2016 prior to transformation announcement;

18. The effect of the practices complained of in paragraphs 5-17 above has been to deprive Selyutin of equal employment opportunities and otherwise adversely affect his rights under the ADA resulting in lost wages, emotional pain, suffering, inconvenience, mental anguish, embarrassment, frustration, humiliation, and loss of enjoyment of life, because of his disability.

19. The unlawful employment practices complained of in paragraphs 5-17 above were intentional.

20. The unlawful employment practices complained of in paragraphs 5-17 above were done with malice or with reckless indifference to the federally protected rights of Aleksandr Selyutin.

#### PRAYER FOR RELIEF

Wherefore, the Plaintiff respectfully requests that this Court:

A. Order the Defendants, the Defendants' officers, agents, servants, employees, and attorneys; and other persons who are in active concert or participation with it from

harassment, retaliation, invasion of privacy, monitoring, following and other wrongful conduct and from financing of such activities or conduct against Aleksandr Selyutin, his parents, friends and relatives;

C. Order the Defendants to make whole Aleksandr Selyutin by providing appropriate back pay with prejudgment interest, in amounts to be determined at trial, and other affirmative relief necessary to eradicate the effects of its unlawful employment practices, including but not limited to full amount of front pay;

D. Order the Defendants to make whole Aleksandr Selyutin by providing compensation for past and future pecuniary losses resulting from the unlawful employment practices complained of above, including but not limited to any jobs searches, medical expenses, medical insurance expenses and other pecuniary losses, in amounts to be determined at trial;

E. Order Defendant to make whole Aleksandr Selyutin by providing compensation for past and future pecuniary losses resulting from the unlawful practices complained of above, including pain and suffering, emotional distress, mental torture, indignity, inconvenience, loss of enjoyment of life, loss of self-esteem, and humiliation, in amounts to be determined at trial;

F. Order Defendant to pay Aleksandr Selyutin punitive damages for its malicious and reckless conduct, as described above, in an amount to be determined at trial;

G. Grant such further relief as the Court deems necessary and proper in the public interest; and

H. Award the Plaintiff the costs of this action.



JURY TRIAL DEMAND

The Plaintiff requests a jury trial on all questions of fact raised by its complaint.

Respectfully submitted,

By the Plaintiff, Self-Represented

Aleksandr Selyutin

06-06-2018

## ATTACHMENT LIST OF ALL DEFENDANTS

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ILLINOIS NORTHERN DIVISION

Aleksandr Selyutin

)

)

Plaintiff,

)

)

Civil Action No.

V.

)

)

Aon plc., Aon Service Corporation

)

Unknown Defendants

Defendant.

)

### List of All Defendants

Defendant – Aon plc., is a United Kingdom public limited company with its principal address located at the Aon Center, the Leadenhall Building; Leadenhall Street, London, England EC3V 4 AN; tel: +44 (0)20 7623 5500, fax: +44 (0)20 7621 1511;

Defendant - Aon Service Corporation is a Delaware corporation with its principal address at 200 E. Randolph Street, Chicago, Illinois 60601; tel: +1-312-381-1000;

Defendant - Unknown Defendants.



Aleksandr Selyutin &lt;alex.selyutin2017@gmail.com&gt;

**Charge Of Discrimination**

1 message

**U.S. Equal Employment Opportunity Commission** <noreply@eeoc.gov>  
To: ALEX.SELYUTIN2017@gmail.com

Thu, Feb 8, 2018 at 3:08 PM

**U.S. Equal Employment Opportunity Commission**

This email confirms that your Charge of Discrimination against AON PLC was filed with the United States Equal Employment Opportunity Commission on 02/08/2018 . The Charge Number is 440-2018-02867. Please refer to that number when communicating with the US EEOC about your charge. A copy of the Charge of Discrimination is attached. Please retain a copy of this document for your files. A copy of the Charge of Discrimination is also available by signing-in to the EEOC Charging Party Portal.

(Document Attached)

This email is an official notification from the U.S. Equal Employment Opportunity Commission (EEOC) regarding charge 440-2018-02867. Please do not reply to this email.

*Notice of Confidentiality: The information contained in this transmission may contain privileged and confidential information, including information protected by federal and state privacy laws. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or duplication of this communication is strictly prohibited and may be unlawful. If you are not the intended recipient, please contact us at [digital-support@eeoc.gov](mailto:digital-support@eeoc.gov) and destroy all copies of the original message and attachments.*

**2 attachments****Signed Charge Of Discrimination.pdf**

37K

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186K

EEOC Form 5 (11/09)

<b>CHARGE OF DISCRIMINATION</b> This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.		Charge Presented To: _____ Agency(ies) Charge No(s): _____ <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC <span style="float: right;"><b>440-2018-02867</b></span>	
<b>Illinois Department Of Human Rights</b> and EEOC <i>State or local Agency, if any</i>			
Name (indicate Mr., Ms., Mrs.) <b>Mr. Aleksandr Selyutin</b>		Home Phone <b>847-679-4587</b>	Year of Birth <b>1968</b>
Street Address <b>8828 Niles Center Rd., # 213, SKOKIE, IL 60077</b>			
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name <b>AON PLC</b>		No. Employees, Members <b>501+</b>	Phone No. <b>(312) 381-1000</b>
Street Address <b>200 E Randolph St., CHICAGO, IL 60601</b>			
Name  		No. Employees, Members  	Phone No.  
Street Address  			
DISCRIMINATION BASED ON (Check appropriate box(es).) <input type="checkbox"/> RACE <input type="checkbox"/> COLOR <input type="checkbox"/> SEX <input type="checkbox"/> RELIGION <input type="checkbox"/> NATIONAL ORIGIN <input type="checkbox"/> RETALIATION <input type="checkbox"/> AGE <input checked="" type="checkbox"/> DISABILITY <input type="checkbox"/> GENETIC INFORMATION <input type="checkbox"/> OTHER (Specify) _____		DATE(S) DISCRIMINATION TOOK PLACE Earliest                      Latest <b>05-10-2017</b> <b>05-10-2017</b> <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <b>I began my employment with Respondent on or about March 14, 2001. My most recent position was Senior Finance Manager. Respondent was aware of my disability. During my employment, I was subjected to harassment. On or about May 10, 2017, I was discharged. I believe that I have been discriminated against because of my disability, in violation of the Americans with Disabilities Act of 1990, as amended.</b>			

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.	NOTARY – When necessary for State and Local Agency Requirements
I declare under penalty of perjury that the above is true and correct.  <div style="text-align: center;">Digitally signed by Aleksandr Selyutin on 02-08-2018 04:08 PM EST</div>	I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT  SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE (month, day, year)



## U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

## DISMISSAL AND NOTICE OF RIGHTS

To: Aleksandr Selyutin  
8828 Niles Center Rd.  
# 213  
Skokie, IL 60077

From: Chicago District Office  
500 West Madison St  
Suite 2000  
Chicago, IL 60661



On behalf of person(s) aggrieved whose identity is  
CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

440-2018-02867

Marcelo Ordonez,  
Investigator

(312) 869-8142

## THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

## - NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

**Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act:** This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

**Equal Pay Act (EPA):** EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission

Enclosures(s)

Julianne Bowman,  
District Director

(Date Mailed)

cc:

AON SERVICE CORPORATION  
c/o Janice Houlihan  
Employment Law Compliance Manager  
200 East Randolph St., 8th Floor  
Chicago, IL 60601